AMENDMENT AND RESPONSE UNDER 37 CFR § 1.111
Serial Number: 10/081,125
Filing Date: February 21, 2002
Title: DISTRIBUTED CUSTOMER RELATIONSHIP MANAGEMENT SYSTEMS AND METHODS

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REMARKS

This responds to the Office Action dated on June 13, 2006. Claims 1, 15, 17, 21, 51, and 69 are amended. Claim 77 is cancelled. No claims are added. As a result, claims 1-76, and 78-79 are now pending in this patent application, with claims 3-12, 16, 18, 25-36, 38-50, 52-54, 56-61, 63-68, 71-72, 74-75, and 78-79 having been withdrawn by the Examiner.

§112 Rejection of the Claims

Claims 1, 2, 13, 14, 15, 17, 19, 20, 21, 22, 23, 24, 37, 51, 55, 62, 69, 70, 73 and 76 were rejected under 35 U.S.C. § 112, second paragraph, for indefiniteness.

- The Office Action asserts that claim 1 is unclear for its use of "if any." Applicant has amended claim 1 to overcome this rejection. Accordingly, Applicant respectfully requests withdrawal of this rejection.

- The Office Action asserts that claim 14 is indefinite for is use of "likely relevant." Applicant respectfully traverses. A computer-implemented determination often has a given sensitivity and specificity, which Applicant respectfully submits does not necessarily render a claim indefinite. Applicant respectfully requests reconsideration and withdrawal of this rejection.

- The Office Action asserts that claim 15 is unclear if the list of items is conjunctive or disjunctive. Although Applicant respectfully submits that use of "at least one" is adequately clear that it renders the list disjunctive, Applicant has amended claim 14 to clarify that the list is disjunctive. Accordingly, Applicant respectfully requests withdrawal of this rejection.

- The Office Action asserts that claim 17 is unclear in its use of "a concept-organized second content provider." Applicant has amended claim 17 to clarify. Accordingly, Applicant respectfully requests withdrawal of this rejection.

- The Office Action asserts that claim 51 is unclear in which elements make up the second content provider. Applicant has amended claim 51 to clarify. Applicant respectfully submits that the second content provider includes a second communication interface, a second knowledge map, and a second dialog engine, as

recited in claim 51. Accordingly, Applicant respectfully requests withdrawal of this rejection.

- The Office Action asserts that claim 55 is indefinite in its use of the phrase "escalating the user session." Applicant respectfully traverses on the grounds that one of ordinary skill in the art would understand such phrase, particularly in light of the examples described in the specification, such as at page 25, line 8 through page 26, lines 20. Accordingly, Applicant respectfully requests withdrawal of this rejection.

- The Office Action asserts that claim 62 is indefinite in its use of "user-provider dialog." Applicant respectfully traverses. The language of claim 62 itself recites a user-provider dialog "between the user and the second content provider to further guide the user to a portion of the second content that is deemed likely relevant to the user's needs." Moreover, the present specification explains examples of the dialog, such as at page 11, line 19 through page 13, lines 9. Accordingly, Applicant respectfully requests withdrawal of this rejection.

- The Office Action asserts that claim 69 is indefinite for its user of "user-provider session." Applicant respectfully traverses. The language of claim 69 itself recites carrying out a user-provider session "between the user and the first content provider to determine whether any first concept node is likely relevant to the user's needs. Thus, Applicant respectfully submits that one of ordinary skill in the art would understand what constitutes a session between a user and the first content provider, particular in light of the detailed examples described in the present specification. Accordingly, Applicant respectfully requests withdrawal of this rejection.

§103 Rejection of the Claims

Claims 1, 2, 13-15, 17, 19, 20-24, 37, 51, 55, 62, 69, 70, 73 and 76 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Tou et al. (U.S. Patent No. 4,930,071) in view of Gralla's "How the Internet Works", Millennium Ed., Que Corporation, September 23, 1999. Applicant respectfully traverses.

Concerning claims 1, 2, 13, 14, 15:

The Office Action asserts:

Tou discloses the claimed invention but does not directly disclose an intranet. Gralla teaches the Internet network. Therefore it would have been obvious to a person having ordinary skill in the art at the time the invention was made to modify Tou as taught by Gralla and include the Internet. Such a modification would have allowed access to the system in Tou from places distant from database locations.

(Office Action ¶ 9.) Applicant respectfully disagrees with any assertion that Tou discloses the claimed invention but for an intranet. For example, Applicant cannot find in Tou any disclosure, teaching, or suggestion of carrying out a dialog between a user and a first content provider hosted by a first entity to confirm that a taxonomic concept node is likely relevant to the user's needs, wherein "the concept node includes a calling link" to a second content provider hosted by a second entity different from the first entity, wherein the second content provider includes second content managed substantially independently from the first content of the first content provider.

Although Fig. 5 of Tou apparently does refer to a taxonomy of "classes", Applicant respectfully submits that nothing in Tou discloses, teaches, or even suggests that such classes should include a "calling link to a second content provider of content that is independently hosted and managed from the first content provider," as recited or incorporated in claim 1. Moreover, even if Gralla discloses "the Internet," the Office Action has failed to point to anything particular in Gralla that discloses, teaches, or even suggests including "a calling link" in a particular taxonomic concept node of a first content provider, such that a user-provider session with the first content provider (which confirms that the particular concept node is likely relevant to the user's needs) results in the first content provider using the calling link in the particular concept node to call and retrieve content from an independently hosted second content provider, as similarly recited or incorporated in these claims.

Applicant's claimed functionality provides a far greater advantage than merely allowing access to the system in Tou from places distant from database locations, as asserted by the Office Action. It allows seamless integration of distributed and independently hosted and managed content, as explained by the present patent specification:

A particular enterprise's CRM system, however, typically must provide assistance relating to several different products. Each of these products may include several components. While these components may be produced by the same business enterprise, they are often produced by other enterprises. Moreover, components from such vendor enterprises may include subcomponents from still other vendor enterprises. Even if a product is substantially produced by a single enterprise, a reseller or another may customize or otherwise modify the product to add value. The information most relevant to a particular customer may relate to the whole product, to a particular component of the product, or to a particular enhancement made to the product. Such information may, therefore, come from any of several different sources, which may be outside the enterprise providing the CRM system that served as the customer's initial contact point. For high-technology products or other products having short life cycles, the enterprise hosting the CRM system that provides the customer's point-of-contact may not have access to the latest and most relevant content (e.g., software patches, etc.) sought by the customer. For today's complex products, the cost of generating the comprehensive information needed by customers is substantial—even though the cost of providing information to customers may be reduced by using an automated CRM content provider. Updating the information involves additional recurring costs. Moreover, customers frequently do not know (and may not care about) the exact source of their problem with the product. The choice of a particular business enterprise for initiating an automated CRM session, however, clearly indicates who the customer expects to solve his or her problem. For these and other reasons, the present inventors have recognized the existence of an unmet need to provide distributed CRM systems and techniques that provide users with content that may be generated and/or managed by different entities.

(Specification at page 2, line 27 – page 3, line 33.) The present patent application goes on to explain how to use a calling link at a particular taxonomic concept node of a first content provider to link to an independently hosted and managed second content provider when that concept node of the first concept provider is confirmed to be likely relevant to the user's needs. Because this feature is apparently absent from Tou and/or Gralla, Applicant respectfully submits that all claim elements are not present in the cited references and, therefore, no *prima facie* case of obviousness exists with respect to claims 1, 2, and 13-15. Accordingly, Applicant respectfully requests withdrawal of this basis of rejection of these claims.

Additionally, with respect to claim 2, Applicant can find nothing in the cited references disclosing how to use a calling link at a confirmed concept node at a first content provider managed by a first entity to retrieve content from a second content

provider that is independently managed by a second entity, wherein the second entity is a different business enterprise than the first entity, as recited in claim 2. Such claim language further emphasizes a useful problem solved by the present invention—how to seamlessly integrate content retrieval across customer relationship management (CRM) systems managed by different enterprises. Because this feature is apparently absent from the cited references, Applicant respectfully submits that all claim elements are not present in the cited references and, therefore, no *prima facie* case of obviousness exists with respect to claim 2. Accordingly, Applicant respectfully requests withdrawal of this basis of rejection of claim 2.

Additionally, with respect to claims 13-14, Applicant can find nothing in the cited references disclosing, teaching, or suggesting further carrying out a user-provider dialog between the user and the second content provider to confirm that a concept node of the second content provider is likely relevant to the user query, or returning content from the second content provider to at least one of the first content provider and the user, as respectively recited in claims 13-14. Accordingly, because no *prima facie* case of obviousness exists with respect to these claims, Applicant respectfully requests withdrawal of this basis of rejection of claims 13-14.

Additionally, with respect to claim 15, Applicant can find nothing in the cited references that use a calling link at a confirmed concept node at a first content provider managed by a first entity to call any of a dialog-driven concept-organized second content provider, a web-site second content provider, a web service second content provider, a search engine second content provider, a discussion thread second content provider, or an interface for interacting with a customer service representative, as recited in claim 15. Accordingly, because no *prima facie* case of obviousness exists with respect to claim 15, Applicant respectfully requests withdrawal of this basis of rejection of this claim.

Concerning claims 17, 19, 20-24:

Applicant cannot find in Tou and/or Gralla any disclosure, teaching, or suggestion of a user initiating a session with a first content provider of a first entity, and using the first content provider for calling a second content provider of an independently-managed second entity, and using the concept nodes of the second content provider to return to the

user content that is deemed likely relevant to the user's needs, as presently similarly recited or incorporated in claims 17, 19, 20-24. Accordingly, because all elements recited in such claims are apparently not disclosed, taught, or suggested in the cited references, Applicant respectfully submits that no *prima facie* case of obviousness exists with respect to such claims. Therefore, Applicant respectfully requests withdrawal of this rejection.

Additionally, concerning claim 19, Applicant cannot find in Tou and/or Gralla any disclosure, teaching, or suggestion of integrating the content from the first content provider with the content from the second content provider, as similarly recited in claim 19. Accordingly, because all elements recited in claim 19 are apparently not disclosed, taught, or suggested in the cited references, Applicant respectfully submits that no *prima facie* case of obviousness exists with respect to such claim. Therefore, Applicant respectfully requests withdrawal of this rejection.

Additionally, concerning claim 20, Applicant cannot find in Tou and/or Gralla any disclosure, teaching, or suggestion of reporting to the first entity information about the first entity's usage of the second content provider, as similarly recited in claim 20. Accordingly, because all elements recited in claim 20 are apparently not disclosed, taught, or suggested in the cited references, Applicant respectfully submits that no *prima facie* case of obviousness exists with respect to such claim. Therefore, Applicant respectfully requests withdrawal of this rejection.

Similarly, concerning claim 21, Applicant cannot find in Tou and/or Gralla any disclosure, teaching, or suggestion of reporting to the first entity benchmarking information about other entities, which are different from the first entity, usage of the second content provider, as similarly recited in claim 21. Accordingly, because all elements recited in claim 21 are apparently not disclosed, taught, or suggested in the cited references, Applicant respectfully submits that no *prima facie* case of obviousness exists with respect to such claim. Therefore, Applicant respectfully requests withdrawal of this rejection.

Additionally, concerning claim 22, Applicant cannot find in Tou and/or Gralla any disclosure, teaching, or suggestion of branding the content from the second content provider, at least in part, using branding associated with the first entity, as similarly recited in claim 22.

Accordingly, because all elements recited in claim 22 are apparently not disclosed, taught, or suggested in the cited references, Applicant respectfully submits that no *prima facie* case of obviousness exists with respect to such claim. Therefore, Applicant respectfully requests withdrawal of this rejection.

Additionally, concerning claim 23, Applicant cannot find in Tou and/or Gralla any disclosure, teaching, or suggestion of carrying out the user-provider session between the user and the second content provider and basing the session at least in part on at least one attribute associated with the first entity, as similarly recited in claim 23. Accordingly, because all elements recited in claim 23 are apparently not disclosed, taught, or suggested in the cited references, Applicant respectfully submits that no *prima facie* case of obviousness exists with respect to such claim. Therefore, Applicant respectfully requests withdrawal of this rejection.

Additionally, concerning claim 24, Applicant cannot find in Tou and/or Gralla any disclosure, teaching, or suggestion of accessing only a portion of the second content that is defined by the attribute as being relevant to the first entity, as similarly recited in claim 24. Accordingly, because all elements recited in claim 24 are apparently not disclosed, taught, or suggested in the cited references, Applicant respectfully submits that no *prima facie* case of obviousness exists with respect to such claim. Therefore, Applicant respectfully requests withdrawal of this rejection.

Concerning claim 37:

For reasons similar to those already discussed above with respect to the § 103 rejection of claims 1, 2, 13, 14, 15, Applicant cannot find in Tou and/or Gralla any disclosure, teaching, or suggestion of a calling link to a second content provider, the calling link associated with at least one exit node of the first concept nodes to which first content is mapped, as similarly recited in claim 37. Accordingly, because all elements recited in claim 37 are apparently not disclosed, taught, or suggested in the cited references, Applicant respectfully submits that no *prima facie* case of obviousness exists with respect to such claim. Therefore, Applicant respectfully requests withdrawal of this rejection.

Concerning claim 51:

Applicant cannot find in Tou and/or Gralla any disclosure, teaching, or suggestion of, among other things:

- a first dialog engine of a first content provider, the first dialog engine to carry out a dialog with the user to restrict a search for content pertaining to the user's needs to at least one particular subset of the first concept nodes;

- a communication interface of the first content provider, including at least one exit first concept node that calls the second content provider;

- at least one entry second concept node of the second content provider, configured for being called by the first content provider; and

- a second dialog engine of the second content provider, to carry out a dialog with the user to restrict a search for content pertaining to the user's needs to at least one particular subset of the second concept nodes.

Accordingly, because all elements recited in claim 51 are apparently not disclosed, taught, or suggested by the cited references, Applicant respectfully submits that no *prima facie* case of obviousness exists with respect to claim 51. Therefore, Applicant respectfully requests withdrawal of this basis of rejection of this claim.

Concerning claim 55:

Applicant cannot find in Tou and/or Gralla any disclosure, teaching, or suggestion of carrying out a user-provider dialog between the user and the first content provider hosted by a first entity to determine which concept nodes pertain to the user's needs, and escalating the user session to an interface for interacting with a human customer service representative associated with a second entity, different from the first entity, as similarly recited in claim 55. Accordingly, because all elements recited in claim 55 are apparently not disclosed, taught, or suggested by the cited references, Applicant respectfully submits that no *prima facie* case of obviousness exists with respect to claim 55. Therefore, Applicant respectfully requests withdrawal of this basis of rejection of this claim.

Concerning claim 62:

Applicant cannot find in Tou and/or Gralla any disclosure, teaching, or suggestion of receiving from a user, at a telephonic interface for interacting with a human customer service representative associated with a first entity, a telephonic user query pertaining to the user's needs, and initiating a user session with an automated CRM second content provider hosted by a second entity, this user session using a subset of the second concept nodes determined based on

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the user's previous session with the human customer service representative, and carrying out a user-provider dialog between the user and the second content provider to further guide the user to a portion of the second content that is deemed likely relevant to the user's needs. Accordingly, because all elements recited in claim 62 are apparently not disclosed, taught, or suggested by the cited references, Applicant respectfully submits that no *prima facie* case of obviousness exists with respect to claim 62. Therefore, Applicant respectfully requests withdrawal of this basis of rejection of this claim.

Concerning claims 69, 70, 73 and 76:

Applicant cannot find in the cited portions of Tou and/or Gralla any disclosure, teaching, or suggestion of, among other things, mapping to first concept nodes of an automated concept-organized CRM first content provider hosted by the first entity, second content hosted by the portal associated with the second entity, as presently recited or incorporated in these claims. Accordingly, because all elements recited or incorporated in these claims are apparently not disclosed, taught, or suggested by the cited references, Applicant respectfully submits that no *prima facie* case of obviousness exists with respect to these claims. Therefore, Applicant respectfully requests withdrawal of this basis of rejection of these claims.

Additionally, concerning claim 70, Applicant cannot find in the cited portions of Tou and/or Gralla any disclosure, teaching, or suggestion of escalating, if an escalation request is received from the user, the user session to an interface for interacting with a human customer service representative. Accordingly, because all elements recited in claim 70 are apparently not disclosed, taught, or suggested by the cited references, Applicant respectfully submits that no *prima facie* case of obviousness exists with respect to this claim. Therefore, Applicant respectfully requests withdrawal of this basis of rejection of this claim.

Additionally, concerning claim 73, Applicant cannot find in the cited portions of Tou and/or Gralla any disclosure, teaching, or suggestion of initiating a service incident report (SIR). Accordingly, because all elements recited in claim 73 are apparently not disclosed, taught, or suggested by the cited references, Applicant respectfully submits that no *prima facie* case of obviousness exists with respect to this claim. Therefore, Applicant respectfully requests withdrawal of this basis of rejection of this claim.

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Additionally, concerning claim 76, Applicant cannot find in the cited portions of Tou and/or Gralla any disclosure, teaching, or suggestion of providing an indication of content at the portal based at least in part on previous user sessions of users associated with the second entity. Accordingly, because all elements recited in claim 76 are apparently not disclosed, taught, or suggested by the cited references, Applicant respectfully submits that no *prima facie* case of obviousness exists with respect to this claim. Therefore, Applicant respectfully requests withdrawal of this basis of rejection of this claim.

Withdrawn Claims

Applicant reserves all rights with respect to the withdrawn claims 3-12, 16, 18, 25-36, 38-50, 52-54, 56-61, 63-68, 71-72, 74-75, and 77-79, including rights of traversal, petition, re-introduction in this patent application or one or more other patent applications, which may claim priority from this patent application.

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CONCLUSION

Applicant respectfully submits that the claims are in condition for allowance, and notification to that effect is earnestly requested. The Examiner is invited to telephone Applicant's attorney at (612) 373-6951 to facilitate prosecution of this application.

If necessary, please charge any additional fees or credit overpayment to Deposit Account No. 19-0743.

Respectfully submitted,

MARK ANGEL ET AL.

By their Representatives,
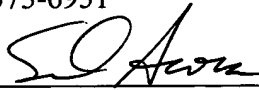
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CERTIFICATE UNDER 37 CFR 1.8: The undersigned hereby certifies that this correspondence is being deposited with the United States Postal Service with sufficient postage as first class mail, in an envelope addressed to: Mail Stop Amendment, Commissioner of Patents, P.O. Box 1450, Alexandria, VA 22313-1450 on this _13_ day of September 2006.

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